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DOCUMENT
ELECTRONICALLY FILED
DOC#:
DATE FILED: 2/10/22

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February 2, 2022

BY ECF

Hon. Andrew L. Carter, Jr.
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

Re: United States v. Oberholzer, et al., 21 CR 475 (ALC)

Dear Judge Carter:

I am writing on behalf of defendant Barend Oberholzer to respectfully request a modification of the defendant's conditions of release which would permit him to travel to Las Vegas from February 11 through 13, 2022 so that his daughter may participate in a gymnastics competition taking place at the Bally's Hotel and Casino. Both the government, by AUSA Jilan Kamal, and Pretrial Services, by PTSO Dominique Jackson, take no position on the defendant's application. If approved, Mr. Oberholzer would provide Pretrial Services with a detailed itinerary of his trip.

By way of background, on March 2, 2021, Judge Lehrburger released Mr. Oberholzer on a \$500K personal recognizance bond secured by two financially responsible persons, with conditions including, *inter alia*, that the defendant's travel be limited to the Southern and Eastern Districts of New York, and the Central and Southern Districts of California. Since that date, the defendant has remained compliant with his conditions of release.

JEFFREY LICHTMAN

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Thank you for the Court's consideration on this application; I remain available for a teleconference should Your Honor deem it necessary.

Respectfully submitted,

A handwritten signature in dark ink, consisting of a long horizontal line followed by a stylized, looped mark.

Jeffrey Lichtman

cc: Jilan Kamal Esq.
Assistant United States Attorney (by ECF)

Dominique Jackson
Pretrial Services (by email)

So Ordered:

A handwritten signature in dark ink, appearing to read 'Andrew L. Carter, Jr.', followed by the date '2/10/22'.

Hon. Andrew L. Carter, Jr.